

Eli Richardson

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE,
NASHVILLE DIVISION**

Vimala, LLC, et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	No. 3:19-cv-00513
WELLS FARGO BANK, N.A., et al.,)	JUDGE RICHARDSON
)	
Defendants.)	
_____)	
)	
)	

**PLAINTIFFS' MOTION TO EXTEND DEADLINE TO RESPOND TO SPECIAL
MASTER COOPER'S MOTION**

Pursuant to FRCP 6(b), Plaintiffs Vimala, LLC and Alecia Venkataraman respectfully move for an extension of time to April 12, 2023 to respond to the Special Master's Motion (Doc. No. 208).

As grounds for the continuance, undersigned counsel would state: (1) that he has been retained for the limited purpose of entering into discussions with certain of Plaintiffs' creditors, including the Special Master; (2) that it is possible that the parties will be able to reach an agreement given additional time; and (3) that if no agreement is reached Plaintiffs will respond to the motion on the same timeline as Plaintiffs' former counsel has to respond to the motion (by April 12, 2023), therefore no delay in the proceedings will occur by virtue of the additional time.